

## **EXHIBIT 20**

From: [Matthew L. Schwartz](#)  
To: [Mermelstein, Rebecca \(USANYS\)](#); [Hector, Aimee \(USANYS\)](#); [Blais, Brian \(USANYS\)](#)  
Cc: [Silvia L. Serpe](#)  
Subject: RE: United States v. Galanis, et al., No. 16 Cr. 371 (RA)  
Date: Wednesday, April 12, 2017 4:25:45 PM

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Rebecca --

Below please find a list of the names and affiliations of the people on our list of search terms. The only four that are not, to our knowledge, lawyers are Jakob Edell, Joseph Park, Kelly Vazquez and Andrew Langston. Ms. Vazquez is a legal secretary at Kaye Scholer. Mr. Edell is a paralegal at Gunderson Dettmer. Mr. Park is a senior paralegal at Klasko, Rulon, Stock and Seltzer. And Mr. Langston is a corporate/finance project assistant at Kaye Scholer. These people have been included because they may have sent and/or received potentially privileged communications in their attorney-support capacities at their respective law firms. Indeed, we expect that there are other assistant/paralegal/support staff who may be copied on privileged communications, but hopefully they will be caught by the universal domain name (e.g., @bsflp.com).

Kaye Scholer: Zachary Ainsztein, Stephen Culhane, Kelly Vazquez, Andrew Langston, Megan Burke, Kathleen Wechter

Bird, Marella, Boxer, Wolpert, Nessim, Drooks, Lincenberg & Rhow, P.C.: Ariel Neuman, Kim Miller,

Gunderson Dettmer Stough Villeneuve Franklin & Hachigian, LLP: Brian Patterson, Jakob Edell, Jason Ford, Naveen Pai

The Wolff Law Firm / Wolff Law: Clifford Wolff

Boies Schiller Flexner LLP: Karen Dunn, Joseph Eno, Michael Gottlieb, Heather King, Ross McSweeney, Matthew Schwartz, Bret Vallacher

Hunter Taubman Weiss LLP / Hunter Taubman Fischer LLC: Elliot Weiss, Mark Hunter, Stephen Weiss

CKR Law: Stephen Weiss

Klasko, Rulon, Stock and Seltzer, LLP: Joseph Park, Suzanne Seltzer

The Seltzer Firm PLLC: Colin Shekart

Others (solo or in-house counsel):

Sam Konigsberg  
Vadym Pozharskyi  
John Nicelli  
Eric Schwerin  
Hunter Biden  
Sara Zeejah

With respect to Hunter Biden specifically, our understanding is that he is an active lawyer in addition to being an investor, and may have provided legal advice in connection with matters that may be discussed in the subject email accounts (which matters of course will go far afield of the subject matter of your case). Of course if our privilege review reveals that he was not acting in a legal capacity, then -- assuming you agree that we should conduct the privilege review ourselves -- we will not mark the relevant communication privileged, but I cannot categorically exclude him as a participant in privileged communications, and nor should you.

Please let me know if you have any other questions.

-mls

Matthew L. Schwartz  
BOIES SCHILLER FLEXNER LLP  
212-303-3646 (Direct)  
646-337-5787 (Mobile)

-----Original Message-----

From: Mermelstein, Rebecca (USANYS) [<mailto:Rebecca.Mermelstein@usdoj.gov>]  
Sent: Friday, April 7, 2017 10:44 AM  
To: Matthew L. Schwartz; Hector, Aimee (USANYS); Blais, Brian (USANYS)  
Cc: Silvia L. Serpe  
Subject: RE: United States v. Galanis, et al., No. 16 Cr. 371 (RA)

Matt,

Your list of proposed search terms includes "hunter" "hbiden" and "hunter@rstp.com." Assuming these refer to Hunter Biden, we do not understand their inclusion in your list of proposed terms as we understand Biden to have been Archer's business partner and not to have served in any legal capacity. Accordingly, please explain your basis for the inclusion of these terms.

With regard to the other names of individuals on your list, (1) for each attorney (or other law firm personnel) please identify the law firm with which the individual is affiliated; and (2) for any non-attorney/non legal personnel please provide a justification for their inclusion in the proposed list of search terms.

Thanks,

Rebecca

-----Original Message-----

From: Matthew L. Schwartz [<mailto:mlschwartz@BSFLLP.com>]  
Sent: Thursday, April 6, 2017 6:06 PM  
To: Hector, Aimee (USANYS) <[AHector@usa.doj.gov](mailto:AHector@usa.doj.gov)>; Blais, Brian (USANYS) <[BBlais@usa.doj.gov](mailto:BBlais@usa.doj.gov)>;  
Mermelstein, Rebecca (USANYS) <[RMermelstein@usa.doj.gov](mailto:RMermelstein@usa.doj.gov)>  
Cc: Silvia L. Serpe <[sserpe@serperyan.com](mailto:sserpe@serperyan.com)>  
Subject: United States v. Galanis, et al., No. 16 Cr. 371 (RA)

Aimee, Rebecca, Brian --

Please see the attached correspondence. Also, please let me know when we can expect to receive the complete Google and Aptix productions. When we talked on Monday you said you were going to send it right over.

-mls

Matthew L. Schwartz  
BOIES SCHILLER FLEXNER LLP  
212-303-3646 (Direct)  
646-337-5787 (Mobile)

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